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7 Counsel for Defendant Waller

8 **IN THE UNITED STATES DISTRICT COURT FOR**
9 **THE DISTRICT OF NEVADA**

10 UNITED STATE OF AMERICA,

11 Plaintiff,

12 v.

13 WILLIAM WALLER,

14 Defendant.
15 _____

Case No. 2:18-00112-JCM-VCF

STIPULATION AND PROPOSED
ORDER TO CONTINUE
SENTENCING
(First Request)

16 IT IS HEREBY STIPULATED AND AGREED, by and between The United States
17 of America, through Nicholas Trutanich, United States Attorney, and Christopher Magnani
18 and Michael Landman, Trial Attorneys, U.S. Department of Justice, Tax Division, counsel
19 for the United States of America, and Shawn R. Perez, Esq. and Lowell Becraft, counsel for
20 William Waller, that the sentencing hearing currently scheduled for June 21, 2019, be
21 vacated and continued to a date and time convenient to the Court, but no sooner than Friday,
22 August 9, 2019.

23 This Stipulation is entered into for the following reasons:

- 24 1. Counsel for Defendant will be commencing trial on June 17, 2019 in *United States*
25 *v. Burton Ritchie, et al (Ryan Eaton)*, Case No. 15-cr-00285-APG, that is expected to go until
26 approximately mid to end of the week of July 8, 2019.
- 27 2. Trial Counsel for the United States will be in trial in the District of Colorado
28 commencing in mid-July, 2019.

3. Counsel for Defendant will be starting trial in a multi-defendant case before Judge Navarro in *United States v. Palafox (Cesar Morales)*, Case No. 16-cr-00265, on July 29, 2019. It is expected that this case will last 10-12 weeks, but will be generally dark on Fridays of each week.

4. The Defendant is in custody and does not object to the continuance.

5. The parties agree to the continuance.

6. The additional time requested herein is not sought for purposes of delay, but merely to resolve calendar conflicts by counsel.

7. Additionally, denial of this request for continuance could result in a miscarriage of justice.

8. This is counsel's first request to continue the date for sentencing.

DATED this 24th day of May, 2019.

LAW OFFICE OF SHAWN R. PEREZ

NICHOLAS TRUTANICH
United States Attorney

By: /s/ Shawn R. Perez, Esq.
SHAWN R. PEREZ, ESQ.

By: /s/ Michael C. Landman
MICHAEL C. LANDMAN

/s/ Lowell H. Becraft, Esq.
LOWELL H. BECRAFT
Counsel for Defendant

/s/ Christopher Magnani
CHRISTOPHER MAGNANI

Trial Attorneys
U.S. Department of Justice, Tax Division

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATE OF AMERICA,

Plaintiff,

v.

WILLIAM WALLER,

Defendant.

Case No. 2:18-00112-JCM-VCF

STIPULATION AND PROPOSED
ORDER TO CONTINUE
SENTENCING
(First Request)

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Counsel for Defendant will be commencing trial on June 17, 2019, *United States v. Burton Ritchie, et al (Ryan Eaton)*, Case No. 15-cr-00285-APG, that is expected to go until approximately mid to end of the week of July 8, 2019.

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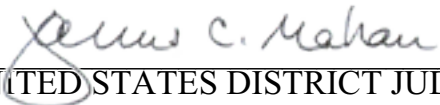
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ORDER

IT IS THEREFORE ORDERED, that the Sentencing Hearing set for June 21, 2019, be vacated and reset to August 12, 2019, at 10:00 a.m.
IT IS SO ORDERED May 28, 2019.


UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 24st day of May, 2019, the undersigned served the foregoing on all counsel herein by causing a true copy thereof to be filed with the Clerk of Court using the CM/ECF system, which was served via electronic transmission by the Clerk of Court pursuant to local order.

/s/ Shawn R. Perez, Esq.

SHAWN R. PEREZ, ESQ.